

REMARKS/ARGUMENTS

Claims 1-44 were pending in this application and have been examined.

No claims have been amended, deleted, or added. Claims 1-44 remain pending in this application after entry of this response.

TELEPHONIC INTERVIEW

Applicant would like to thank Examiner Wong for the telephonic interview regarding this application conducted on January 3, 2006. This response has been prepared based upon discussions with the Examiner during the telephonic interview. A Statement of Summary of the Interview is being filed with this response.

THE CLAIMS

Claims 1-44 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bobrow et al. (Pub. No. US 2002/0029232 A1; hereinafter "Bobrow") and paragraphs [80] and [84] in Applicant's disclosure.

Claim 1

Claim 1 is rejected under 35 U.S.C. 103(a) as being unpatentable over Bobrow et al. (Pub. No. US 2002/0029232 A1; hereinafter "Bobrow") and paragraphs [80] and [84] in Applicant's disclosure.

As discussed with the Examiner during the telephonic interview, Applicant submits that the previous Examiner's interpretation, understanding, and application of paragraphs [80] and [84] of Applicant's specification to reject Applicant's claim 1 (and other claims) is incorrect. In the context of the specification, paragraph [80] does not in any way indicate that the specific technique for determining degree of relevancy information as recited in claim 1 is part of the prior art for this application. For example, claim 1 specifically recites determining a degree of relevancy between objects wherein degree of relevancy is determined between a "first information object" of a "first type" (which is an audio object, video object, or an image object as recited in claim 1) and an information object of a "second type" that is different from the first

type. Accordingly, as recited in claim 1, a degree of relevancy may be determined between objects of different types such as between an audio object and a video object. As agreed to by the Examiner, such a feature recited in claim 1 is not disclosed by paragraph [80] as being known in the prior art.

Further, as discussed with the Examiner, Applicant submits that this feature of claim 1 is also not indicated by paragraph [84] of Applicant's specification as being prior art for this application. Paragraph [84] discusses various content recognition techniques and comparison techniques. Applicant fails to understand how the contents of paragraph [84] can be used as "prior art" against claim 1 (and the other pending claims).

Thus, as agreed to by the Examiner during the telephonic interview, Applicant submits that paragraphs [80] and [84] have been incorrectly used to reject claim 1 -- these paragraphs do not comprise any content that can be used to reject claim 1 under 35 U.S.C. 103.

The Office Action further specifically states that the "determining . . ." feature recited in claim 1 is not disclosed by Bobrow (See Office Action dated 07/11/05: page 3 last paragraph that ends on page 4). Further, in light of the above discussion, no other reference has been identified that cures this deficiency of Bobrow. Applicant thus submits that claim 1 is in a condition for allowance for at least the reasons stated above, in addition to others.

Claims 2-13, 15-27, and 29-41

Applicant submits that independent claims 15 and 29 are allowable for at least a similar rationale as discussed for allowing claim 1, and others.

Applicant submits that claims 2-13, 16-27, and 30-41 which depend from claims 1, 15, and 29 respectively, are also allowable for at least a similar rationale as discussed for allowing claims the independent claims, and others. Further, contrary to what is stated in the Office Action, many of the dependent claims recite additional features that are also not taught or suggested by the cited references thus making the claims patentable for additional reasons.

Claims 14, 28, and 42-44

Applicant submits that claim 14 recites several features that are not disclosed by the cited references. The Office Action acknowledges that several recited features of claim 14 are not disclosed by Bobrow (See Office Action dated 07/11/05: pg. 9). The Office Action then points to paragraphs [80] and [84] of Applicant's specification as disclosing these features. As previously discussed, the use of paragraphs [80] and [84] to reject Applicant's claims is incorrect. As agreed to by the Examiner, Applicant submits that these paragraphs do not comprise content that can be used to reject claim 14 under 35 U.S.C. 103. Further, in light of the above discussion, no other reference has been identified that cures the deficiencies of Bobrow. Claim 14 is thus patentable for at least this reason.

Additionally, contrary to what is stated in the Office Action, several features of claim 14 are not disclosed by Bobrow, making claim 14 patentable for additional reasons.

Applicant submits that independent claims 28 and 42 are allowable for at least a similar rationale as discussed for allowing claim 14, and others. Applicant submits that claims 43 and 44 that depend from claim 42 are also allowable for at least a similar rationale as discussed for allowing claim 42, and others. Further, contrary to what is stated in the Office Action, the dependent claims recite additional features that are also not taught or suggested by the cited references thus making the claims patentable for additional reasons.

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Amdt. dated January 11, 2006
Reply to Office Action of July 11, 2005

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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